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April 7, 2019

**VIA ECF AND E-MAIL**

The Hon. Judge Cathy Seibel  
The Hon. Charles L. Brieant Jr.  
Federal Building and United States Courthouse  
300 Quarropas St., Courtroom: 621  
White Plains, NY 10601-4150  
[chambersnysdseibel@nysd.uscourts.gov](mailto:chambersnysdseibel@nysd.uscourts.gov)

Re: *Can't Stop Productions, Inc. v. Sixuvus, Ltd. et al.* 7:17-cv-06513-CS

Hon. Judge Seibel:

We represent Sixuvus, Ltd., Eric Anzalone, Alexander Briley, James Newman, Raymond Simpson and William Whitefield (collectively the "Sixuvus Defendants") in the above referenced action. We write pursuant to rule 1.E of Your Honor's Individual Practices, to respectfully request an adjournment of the conference currently scheduled for April 17, 2019 and the corresponding deadline to submit a joint letter stating the parties views as to next steps, which pursuant to the March 13, 2019 Order is currently due on April 12, 2019.

The reason for the request is that the undersigned, along with Gary Adelman, are actually engaged in a previously scheduled trial in another matter beginning tomorrow April 8, 2019, that is expected to last through April 18, 2019 in the Supreme Court of the State of New York.

If the Court's schedule permits, we respectfully request that said conference be rescheduled for a time that is convenient for the Court on April 30, 2019 or May 2, 2019, and that the joint letter stating the parties views be due three (3) business days before the adjourned date of the conference.

The Sixuvus Defendants have not asked for any prior adjournments of this Conference.

We have conferred with all other parties concerning this request. Counsel for Plaintiff and defendant Rose consented to this request, and advised that there are no conflicts on the proposed dates of April 30<sup>th</sup> or May 2<sup>nd</sup>. Ms. Willis initially responded to our request for an adjournment that her "position is neutral". After sending four emails asking if she would advise if she had conflicts on April 30, 2019 or May 2, 2019, so that we could proposed mutually available alternatives, Ms. Willis responded advising "whatever the Court decides is fine with me, but as I've already stated, I am not in support of your request to adjourn".

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We appreciate the Court's time and consideration, and should Your Honor need any further information, we are available at the Court's convenience.

Respectfully Submitted,

ADELMAN MATZ P.C.



Sarah M. Matz, Esq.

Cc. *(Via ECF)*  
Counsel for Plaintiff  
Karen Willis  
Eric I. Abraham, Esq.

*(Via Email)*  
Richard A. Catalina, Jr., Esq. (rcatalina@hillwallack.com)  
*Counsel for defendant Felipe Rose*